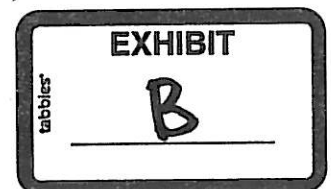


PLAINTIFFS' EXHIBIT B
Sample Testimony Regarding Uniform Maintenance

1. Albery, Raymond: Uniform Type – Hard/Soft Look
 - a. “Mr. Albery washed his uniform separately from his own clothes at the Laundromat once a week. He would go alone. He spent an hour and half washing, drying and ironing his uniform each time he washed it.” (See Ex. 1 at Answers to Interrogatories Nos. 12 & 13).
2. Barnett, Donald: Uniform Type – Hard Look
 - a. Mr. Barnett states, “that he initially dry cleaned [the uniform], but it was expensive, and [Mr. Barnett] thereafter laundered them and shined his shoes. [Mr. Barnett] spent approximately three hours per week maintaining his uniform.” (See Ex. 2 at Answers to Interrogatories Nos. 12 & 13).
3. Bartley, John: Uniform Type – Hard Look
 - a. Mr. Bartley states, “he cleaned his uniform at his home twice a week to comply with SUSA appearance policy. He washed his uniform by itself. It took Bartley approximately 30 minutes to wash and 1 hour to dry his uniform. Bartley spent approximately 3 hours per week maintaining his uniform without pay.” (See Ex. 3 at Answers to Interrogatories Nos. 12 & 13).
4. Benton, Courtney: Uniform Type – Soft Look
 - a. “Mr. Benton states that [he] dry cleaned his uniform two to three times per week. He drove approximately 30 minutes each time he dropped off his uniform to be cleaned or picked up a cleaned uniform. Mr. Benton states that each time he would pick up a cleaned uniform, he would drop off another uniform to be cleaned. He states it cost about \$12.00 each time he dry cleaned his uniform. Mr. Benton also shined his boots once a week, and it took him 20 to 30 minutes each time he shined his boots.” (See Ex. 4 at Answers to Interrogatories Nos. 12 & 13).
5. Burchardt, Joseph: Uniform Type – Hard Look
 - a. Mr. Burchardy states, “he cleaned his uniform at home by laundering it twice per week. Plaintiff regularly spent at least an hour each time cleaning and maintaining his uniform for a total of about 2 hours per week.” (See Ex. 5 at Answers to Interrogatories Nos. 12 & 13).



6. Clinton, Frank: Uniform Type – Hard Look

- a. Mr. Clinton states, “he regularly cleaned his uniform twice each week. He usually washed his uniform separately and also ironed and starched his uniform about twice per week. It took Mr. Clinton approximately 45 minutes to wash and dry his uniform and 30 minutes to starch and press his uniform. Mr. Clinton estimates that he spent approximately two and a half hours per week maintaining his uniform.” (See Ex. 6 at Answers to Interrogatories Nos. 12 & 13).

7. Coyle, John: Uniform Type – Hard Look.

- a. Mr. Coyle states, “he cleaned his uniform at home by laundering it and conservatively estimates that he spent one hour per week maintaining his uniform. He was also required to spend \$2.50 each week for the washer and dryer located in his apartment building.” (See Ex. 7 at Answers to Interrogatories Nos. 12 & 13).

8. Damm, David: Uniform Type – Black Flannel Shirt, Jeans

- a. Mr. Damm states, “he cleaned his uniform each night after his shift at his home to comply with SUSA appearance policy. Damm regularly cleaned his uniform four times each week. It took Damm approximately one hour to wash and dry his uniform. Damm estimates that he spent approximately four hours per week maintaining his uniform.” (See Ex. 8 at Answers to Interrogatories Nos. 12 & 13).

9. Ford, Charles: Uniform Type – Soft Look.

- a. “Mr. Ford states that he, and at times, his wife, washed his uniform separately in their personal washer and dryer. He, and at times his wife, washed his uniform two to three times per week, and each time it took, he or his wife an hour to wash and dry his uniform.” (See Ex. 9 at Answers to Interrogatories Nos. 12 & 13).

10. Forst, James: Uniform Type – Soft Look

- a. Mr. Forst states, “he regularly cleaned his uniform separately at the Laundromat once every two weeks. It took Mr. Forst approximately an hour to wash and dry his uniform. Mr. Forst also took his suit jacket and pants to the cleaners about once a month and spent approximately \$40 each month on dry cleaning, which he was not reimbursed for.” (See Ex. 10 at Answers to Interrogatories Nos. 12 & 13).

11. Foutch, Daniel: Uniform Type – Hard Look.

- a. Mr. Foutch states, "he cleaned and pressed his uniforms two times per week at his home to comply with SUSA appearance policy. He washed his uniforms separately. Foutch also ironed his uniforms about two times per week. It took Foutch approximately two hours to wash, dry and iron his uniforms." (See Ex. 11 at Answers to Interrogatories Nos. 12 & 13).
12. Fries, Charles: Uniform Type – Hard Look.
 - a. "Mr. Fries would wash his uniform in his personal washer and dryer. He would iron his uniform, and he would polish his boots. He washed his uniform once a week, and each time it took him an hour to an hour and 45 minutes to two hours to wash, dry and iron his uniform. During the winter he would also polish his boots five [times] per week, and during the summer he would polish his boots one to two times per week. It would take him 15 to 20 minutes to polish his boots." (See Ex. 12 at Answers to Interrogatories Nos. 12 & 13).
13. Galloway, Paul: Uniform Type – Hard Look.
 - a. "Mr. Galloway cleaned his uniform 4 times a week. He washed his clothes separately from his own clothes because he did not want the dog hair to get on his or their clothes. He would take his uniform to a Laundromat to wash [it]. He spent approximately an hour washing his uniform, 30 minutes steam ironing his clothes and 15 minutes polishing his boots. Mr. Galloway would also take his uniform to the dry cleaners, but not often because it was too expensive." (See Ex. 13 at Answers to Interrogatories Nos. 12 & 13).
14. Gray, Stanley: Uniform Type – Soft Look
 - a. Mr. Gray "cleaned his uniform by laundering at home 2 to 3 times per week. He would wash them separately from other clothes due to the nature of the materials of the uniforms. He also ironed his uniform. Plaintiff regularly spent approximately two to three hours each week cleaning and maintaining his uniform. [Mr. Gray] also shined his boots every day, and spent 30 minutes doing so each time." (See Ex. 14 at Answers to Interrogatories Nos. 12 & 13).
15. Hawkins, Stephanie: Uniform Type – Hard Look.
 - a. Named Plaintiff, Stephanie Hawkins testified that she had her uniform dry cleaned until it became too expensive. Then she washed her uniform separately and ironed it each week. (See Ex. 15 at Hawkins Dep. Tr. 112-122: 18-24; 123:1, 15-24; 124: 1-17; 125: 17-22; 126: 10-16)

16. Howard, Crystal: Uniform Type – Hard Look.
 - a. Howard would clean her uniform at the dry cleaner or wash it separately at the dry cleaner. Howard states she spent about an hour or an hour and a half per week maintaining her uniform and polishing her boots. (*See* Ex. 16 at Howard Dep Tr. 63:5-24; 64:1-24; 65:1-24; 66:1-14; 226:7-19)
17. Huebner, John: Uniform Type – Hard Look.
 - a. Named Plaintiff John Huebner testified that he cleaned and ironed his uniform without pay. (Huebner Dep. at 69-74) Huebner estimated spending three hours per week maintaining his uniform. (*See* Ex. 17 at Huebner Answer to Interrogatory No. 13).
18. Humphris, Samantha: Uniform Type – Hard Look.
 - a. Ms. Humphris “states that she regularly cleaned her uniform once a week. She washed her uniforms separately and also ironed her uniforms about once a week. It took her approximately an hour and a half to wash and dry her uniform and 45 minutes to iron her uniform. Ms. Humphris estimates that she spent approximately two hours and fifteen minutes per week maintaining her uniform.” (*See* Ex. 18 at Answers to Interrogatories Nos. 12 & 13).
19. Hunter, Barbara: Uniform Type – Hard Look.
 - a. Ms. Hunter “states that she took her uniform to the dry cleaners and spent approximately \$8 to have her uniform cleaned, which she was not reimbursed for.” (*See* Ex. 19 at Answers to Interrogatories Nos. 12 & 13).
20. Jackson, Darsemia: Uniform Type – Hard Look.
 - a. Ms. Jackson states that at her particular site, they had a dry cleaning service that cleaned their uniforms. (*See* Ex. 20 at Jackson Dep. Tr. 38:15-18).
21. James, Sharon: Uniform Type – Hard Look.
 - a. “Ms. James states that she worked only one shift, so never had a reason to clean or maintain her uniform.” (*See* Ex. 21 at Answers to Interrogatories Nos. 12 & 13).
22. Keller, Bruce: Uniform Type – Hard Look.

- a. "Mr. Keller typically dry cleaned his uniform during the summer months, or when he had a client meeting, and washed his clothes during the winter months, or when he did not have a chance to drop his uniform off at the dry cleaner. When he dry cleaned his uniform, he would dry clean it 2 to 3 times per week. He states that when he dry cleaned his uniform he would drive approximately an hour to pick up a cleaned uniform or drop off a uniform to be cleaned. He states that when he washed his uniform, he, or at times, his wife, would wash his uniform in their personal washer and dryer 2 to 3 times a week. He, or at times, his wife, would then iron his uniform. Washing, drying and ironing his uniform took about 2 and half hours each time. Mr. Keller states that when he wore his boots, he polished them 3 times per week, and each time it took him an hour to shine them." (*See* Ex. 22 at Answers to Interrogatories Nos. 12 & 13).

23. Likes, Denise: Uniform Type – Hard Look.

- a. "Ms. Likes states that she washed her uniform two times a week in her own personal washer and dryer. It took her one to two hours each time she washed and dried her uniform." (*See* Ex. 23 at Answers to Interrogatories Nos. 12 & 13).

24. Long, Marcus: Uniform Type – Hard Look.

- a. "Mr. Long states that he washed and dried his clothes in his personal washer and dryer. He washed and dried them separately from his own clothes because of the dog hair on the uniform. He washed, dried and ironed his uniform two times a week, and each time it took him about an hour. He would also spend 15 to 20 minutes polishing his boots one to two times per week." He spent approximately two and half hours per week maintaining his uniform. (*See* Ex. 23 at Answers to Interrogatories Nos. 12 & 13).

25. Martinez, Edwin: Uniform Type – Hard Look.

- a. Mr. Martinez "states that he cleaned his uniform by washing and drying it at home. He spent approximately two hours each week cleaning and maintaining his uniform." (*See* Ex. 25 at Answers to Interrogatories Nos. 12 & 13).

26. Miller, Joella: Uniform Type – Hard Look.

- a. "Ms. Miller states that she washed and dried her uniform at the Laundromat once a week. She states that it would take her 3 hours each time to travel to the Laundromat, wash, dry, and fold her clothes. She states that she would spend 10 to 15 minutes ironing her uniform before work 3 times per week. She states that she would also shine her boots

every day that she worked, 5 times per week, and it would take her 20 minutes to shine them each time.” (See Ex. 26 at Answers to Interrogatories Nos. 12 & 13).

27. Morgan, Justin: Uniform Type – Hard Look.

- a. Mr. Morgan “cleaned his uniform at home by laundering. He washed his uniform separately from other clothes.” “Plaintiff regularly spent approximately two hours each week cleaning and maintaining his uniform.” (See Ex. 27 at Answers to Interrogatories Nos. 12 & 13).

28. Muno, Anthony: Uniform Type – Hard Look.

- a. For the first six months of his employment, Muno had his uniform dry cleaned. He also shined his shoes while at home and off the clock. He spent about one to two hours per week shining his boots at home during the first few months of employment. (See Ex. 28 at Muno Dep. Tr. 10:6-11; 10:20 – 11:3; 12:23 – 13:24)

29. Napier, Roy: Uniform Type – Hard Look.

- a. It would take him approximately 30-40 minutes to iron one pair of pants. He ironed 2-3 times per week. The entire process, wash, dry and iron took about an hour and a half (See Ex. 29 at Napier Dep. Tr. 110:3-5; 112:24 – 113:4).

30. Newlin, Gary: Uniform Type – Hard Look.

- a. He spent approximately two and a half hours twice a week washing, drying and ironing his uniform. (See Ex. 30 at Newlin Dep. Tr. 44:16-21).

31. Newson, Robert: Uniform Type – Hard Look.

- a. He spent approximately an hour a day maintaining (including ironing) and polishing his boots (See Ex. 31 at Newson Tr. 114:16 – 118:7; 187:15-19)

32. Potts, David: Uniform Type – Soft Look.

- a. Mr. Potts states that he regularly cleaned his uniforms once every week. He washed his uniforms separately and also ironed his uniforms once per week. It took Mr. Potts approximately two hours to wash and dry his uniforms and about 30 minutes to press his uniforms each week. Mr. Potts estimates that he spent two and a half hours per week maintaining his uniform. He was also required to dry-clean his blazers approximately once a week. It was about \$14 per week to dry clean his blazers, which he

was not reimbursed for. (*See* Ex. 32 at Answers to Interrogatories Nos. 12 & 13).

33. Pullium, Larry: Uniform Type – Soft Look.

- a. “Mr. Pullium states that he dry cleaned his uniform once a week. He states he would drive approximately 15 minutes each time he went to the dry cleaner. Mr. Pullium states that each time he would pick up a cleaned uniform, he would drop off another uniform to be cleaned. He states it would cost approximately \$10.00 to \$20.00 each time he dry cleaned his uniforms. He also states that he spent 10 to 30 minutes, 5 to 6 days a week shining his boots.” (*See* Ex. 33 at Answers to Interrogatories Nos. 12 & 13).

34. Purnell, Douglas: Uniform Type – Hard Look.

- a. Mr. Purnell “states that he cleaned and pressed his uniforms and wiped his shoes down each week at his home to comply with SUSA appearance policy. Purnell regularly cleaned his uniform about once a week. He washed his uniform separately and also ironed and starched his uniform about once a week. It took Purnell approximately an hour and a half to wash and dry his uniform and an hour to starch and press his uniform. Purnell estimates that he spent approximately two and a half hours per week maintaining his uniform.” (*See* Ex. 34 at Answers to Interrogatories Nos. 12 & 13).

35. Rojas, Luis: Uniform Type – Hard Look.

- a. “Mr. Rojas states that he washed his clothes at a Laundromat once a week. He would wash his clothes separately from his personal clothing because of the dog hair on the uniform. It would take him an hour to wash and dry his uniform each time.” “He also states that for the first six months he worked for Defendant he shined his boots. He would shine his boots once a week, and it would take him a half hour each time he shined them.” (*See* Ex. 35 at Answers to Interrogatories Nos. 12 & 13).

36. Salinas, Ruben: Uniform Type – Soft Look.

- a. Mr. Salinas “states that he regularly cleaned two of his SUSA uniforms once per week at the dry cleaners. Salinas spent an average of \$26 per week at the dry cleaners. Salinas’s dry cleaners were a one-hour service in which he could pick up his uniform an hour after dropping it off.” (*See* Ex. 36 at Answers to Interrogatories Nos. 12 & 13).

37. Smith, Larry: Uniform Type – Hard Look.

- a. Plaintiff states that his wife cleaned his uniform at a Laundromat by laundering it separately, which took approximately two hours per week. (See Ex. 37 at Smith Tr. 38:1-23; 39:1-23).

38. Starnes, Donald: Uniform Type – Hard Look.

- a. Mr. Starnes “cleaned his uniform at home by laundering it separately from other clothes and occasionally ironing and pressing it. He regularly spent two to three hours each week cleaning and maintaining his uniform.” (See Ex. 38 at Answers to Interrogatories Nos. 12 & 13).

39. Sutter, David: Uniform Type – Hard Look.

- a. “Mr. Sutter states that he washed and dried his clothes in his personal washer and dryer. He washed them separately because of the coal dust that would settle on his uniform.” “He washed his uniform two to three times a week, and it took him about an hour each time he washed and dried his uniform.” (See Ex. 39 at Answers to Interrogatories Nos. 12 & 13).

40. Thurman, William: Uniform Type – Hard Look.

- a. “Mr. Thurman states that he, and at times his wife, would wash his uniform in their personal washer and dryer. He, and at times his wife, washed his uniform separately from other clothes. He, and at times his wife, would iron his uniform. He, and at times his wife, washed his uniform one to two times a week, and each time it took he, or his wife, an hour to an hour and a half to wash, dry and iron his uniform. Since he, or his wife, washed his uniform at home, both he and his wife were present when his uniform was being washed.” (See Ex. 40 at Answers to Interrogatories Nos. 12 & 13).

41. Turskey, Michael: Uniform Type – Soft & Hard Looks (according to the different positions over his employment).

- a. “Mr. Turskey states that he had the jacket and shirt of all of his uniforms dry cleaned about once a week. It cost him approximately \$10.00 each time he dry cleaned them. He states that he would drive approximately 20 minutes each time he picked up a cleaned uniform from the dry cleaners, or dropped off a uniform to be cleaned. Mr. Turskey states that each time he would pick up a cleaned uniform from the dry cleaners, he would drop off another uniform to be cleaned. He would wash, dry and iron the pants of his uniforms in his personal washer and dryer 3 times per week. Each time he wash, dried and ironed his uniform pants it would take him 1 hour and 15 minutes. Mr. Turskey also states that he spit shined his boots 2

times per week and it would take him 1 hour each time he spit shined them.” (See Ex. 41 at Answers to Interrogatories Nos. 12 & 13).

42. Wallace, Merija: Uniform Type – Hard Look.

- a. Wallace took her uniform to the dry cleaners. She would also wash and iron her uniform at a Laundromat twice a week. (See Ex. 42 at Wallace Dep. Tr. 123: 20-24; 124: 1-5; 128: 10-16; 129: 5-7).

43. Weigel, Kathey: Uniform Type – Hard Look.

- a. Although she never worked a shift and, therefore, didn’t need to clean or iron her uniform, she was required to hem her pants, which took about 10 minutes. (See Ex. 43 at Answers to Interrogatories No. 12; Weigel Dep Tr. 34:18 – 35:6).

44. Young, Alvan: Uniform Type – Hard Look.

- a. Named Plaintiff, Albert Young testified that he took his uniform to the dry cleaners until it became too expensive. Then he washed his uniform separate from his other laundry and ironed it each week. Young dry-cleaned it, and later washed it separately from his other clothes because of the dog hair. Young would not dry it; instead, he would take it directly out of the washer and iron it. He estimated spending one hour per day shining his boots. (See Ex. 44 at Young Dep. Tr. 114:1-8; 115-121; 130-131).